

**Exhibit 2**

**Notice of Motion and Opportunity to Object**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re )  
CITY OF DETROIT, MICHIGAN, ) Chapter 9  
Debtor. ) Case No. 13-53846  
 ) Hon. Steven W. Rhodes  
 )

**NOTICE OF MOTION TO COMPEL THE DEBTOR TO PROVIDE MORE  
SPECIFIC DESCRIPTIONS OF THE SUBJECTS THAT EACH FACT  
WITNESS WILL ADDRESS**

**PLEASE TAKE NOTICE** that on May 7, 2014, Syncora filed the *Motion for Protective Order* in the United States Bankruptcy Court for the Eastern District of Michigan (the “Bankruptcy Court”) seeking to allow Syncora to designate its non-public proprietary and/or commercially sensitive information as confidential and limiting the disclosure of confidential information to certain circumstances.

**PLEASE TAKE FURTHER NOTICE** that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Bankruptcy Court to grant the Objectors' Motion or you want the Bankruptcy Court to consider your views on the Motion, by May 22, 2014<sup>1</sup>, you or your attorney must:

<sup>1</sup> Concurrently herewith, Syncora is seeking expedited consideration and shortened notice of the Motion. If the Court grants such expedited consideration and shortened notice, Syncora will file and serve notice of the new response deadline.

File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:<sup>2</sup>

United States Bankruptcy Court  
Theodore Levin Courthouse  
231 West Lafayette Street  
Detroit, MI 48226

You must also serve a copy of any objection or response upon:

James H.M. Sprayregen, P.C.  
Ryan Blaine Bennett  
Stephen C. Hackney  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200

- and -

Stephen M. Gross  
David A. Agay  
Joshua Gadharf  
MCDONALD HOPKINS PLC  
39533 Woodward Avenue  
Bloomfield Hills, MI 48304  
Telephone: (248) 646-5070  
Facsimile: (248) 646-5075

If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

**PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.**

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<sup>2</sup> A response must comply with F. R. Civ. P. 8(b), (c) and (e).

Dated: May 7, 2014

/s/ Stephen C. Hackney

James H.M. Sprayregen, P.C.  
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*Attorneys for Syncora Guarantee Inc. and Syncora Capital Assurance Inc.*